



4. Pursuant to 28 U.S.C. § 1446(d), the District will promptly provide written notice of removal of the action to Plaintiffs, and will promptly file a copy of this Notice of Removal with the Superior Court of the State of Delaware.

5. No Defendant has been served at the time of the filing of this Notice.

6. This action includes claims arising pursuant to 42 U.S. C. § 1983 conferring original jurisdiction upon this Court. *See, e.g.,* Complaint at ¶¶ 56, 77.

7. Removal is proper in any action that could have originally been filed in federal court. 28 U.S.C. § 1441. District courts have original jurisdiction in cases involving a “[f]ederal question,” i.e., cases “arising under the constitution, laws, or treaties of the United States.” 28 U.S.C. § 1331.

8. This Notice of Removal is being filed within 30 days of the District’s receipt of the Complaint and is therefore timely filed under 28 U.S.C. § 1446(b).

WHEREFORE, the District respectfully requests that the above-titled action be removed to this Court from the Superior Court of the State of Delaware.

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Dated: April 13, 2018